

KENJI M. PRICE #10523
United States Attorney
District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
May 22, 2020
LIAN ABERNATHY, CLERK

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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 20-579-RT
)	
Plaintiff,)	CRIMINAL COMPLAINT;
)	AFFIDAVIT IN SUPPORT
vs.)	
)	
DANIEL KEAULII,)	
)	
Defendant.)	
_____)	

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true
and correct to the best of my knowledge and belief:

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Felon in Possession of Ammunition
(18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about May 21, 2020, within the District of Hawaii, DANIEL KEAULII, the defendant, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime, knowingly possessed ammunition, with said ammunition having been previously shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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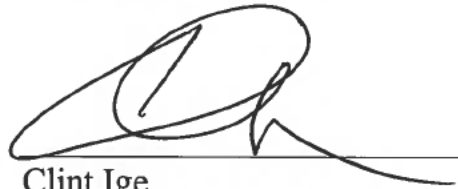
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I further state that I am a Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations (HSI). This Criminal Complaint is based on the following Affidavit which is attached hereto and incorporated herein.

Respectfully submitted,



Clint Ige
Task Force Officer, HSI

This Criminal Complaint and Affidavit in support thereof were presented to, approved by, and probable cause to believe that the defendant above-named committed the charged crime(s) found to exist by the undersigned Judicial Officer at 2:34 p.m. on May 22, 2020.

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2), on this 22nd day of May 2020, at Honolulu, Hawaii.



Rom A. Trader
United States Magistrate Judge

AFFIDAVIT OF CLINT IGE

Clint Ige, after being duly sworn, deposes and states as follows:

1. I submit this affidavit in support of the foregoing Criminal Complaint.
2. I am a Task Force Officer with the Department of Homeland Security, Homeland Security Investigations (HSI) and am also a Detective with the Honolulu Police Department (HPD). I am an investigative law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), and empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.
3. The facts in this affidavit come from my personal observations, my training, my experience, and information obtained from other law enforcement officers and agents and from other witnesses. This affidavit is intended to show only that probable cause exists for the proposed charge(s) and does not set forth all of my knowledge or all of the information known to the government about this matter.
4. On May 21, 2020, officers from the HPD District Eight Crime Reduction Unit (D-8 CRU) received information from a credible, reliable source that Daniel KEAULII was in possession of a shoulder-type firearm holster containing a silver-colored handgun. The source also related that KEAULII was operating a dark-colored Honda wagon bearing Hawaii license plates SZN774. HPD D-8 CRU officers also had knowledge that KEAULII was wanted on a twenty-five thousand dollar (\$25,000) Probation Revocation Warrant.
5. On May 21, 2020, at about 2:40 p.m., HPD D-8 CRU officers observed a dark blue-colored, four-door, 1997 Honda station wagon sedan bearing Hawaii license plates SZN774, registered owner: transfer pending (hereinafter Suspect Vehicle) parked, unoccupied, in the parking lot area of 87-764 Farrington Highway, Waianae, Hawaii 96792. The aforementioned address is known by HPD D-8 CRU officers, to be an illegal gambling establishment commonly referred to as the "Gold Coast" game room.
6. While conducting surveillance of the Suspect Vehicle, HPD D-8 CRU officer Michael D. LACSON observed KEAULII, whom he knew through previous law enforcement contact to be a convicted felon, walking through the Gold Coast parking lot wearing green-colored camouflage pants and jacket with a black-colored undershirt.

7. Because KEAULII's jacket was unbuttoned and flared open as he walked, Officer LACSON was able to observe a black-colored firearm shoulder holster strapped across his chest area over his black-colored shirt.

8. Officer LACSON also observed a silver-colored object with a brown-colored pistol grip protruding from the shoulder holster, which was resting under KEAULII's left armpit area. Based on his training and experience, Officer LACSON recognized the silver-colored object and the brown-colored pistol grip to be components of a firearm.

9. While conducting covert surveillance in unmarked HPD vehicles, D-8 CRU officers observed KEAULII approach the Suspect Vehicle accompanied by an unknown female and two unknown males and enter it. KEAULII entered the front driver's seat, the unknown female entered the front passenger seat, and the two unknown males entered the rear seats respectively.

10. On May 21, 2020, at about 2:50 p.m., the Suspect Vehicle, which was being operated by KEAULII, exited the parking lot area, turned left onto Farrington Highway and proceeded to travel in the eastbound direction. As the Suspect Vehicle approached the area of Farrington Highway and Lualualei Naval Road, HPD D-8 CRU Officer ABELLANIDA observed the unknown female and two unknown males exit the Suspect Vehicle and flee the area on foot. Shortly thereafter, Officer ABELLANIDA observed the Suspect Vehicle blow out its rear left tire, lose control and collide into the southwest corner wall area of the Napa Auto Parts Store located at 87-2044 Farrington Highway, Waianae, Hawaii 96792.

11. As KEAULII exited the front driver's seat of the Suspect Vehicle, Officer ABELLANIDA observed KEAULII remove what appeared to be a silver-colored pistol from the shoulder holster that was affixed to his chest area, and throw it onto the front driver's side floorboard area of the Suspect Vehicle. Officer ABELLANIDA had a clear and unobstructed view of KEAULII from about 15 feet away.

12. After Officer ABELLANIDA approached the Suspect Vehicle, identified himself and announced his office, KEAULII fled the area on foot and left the front driver's side door of the Suspect Vehicle open. After a brief foot pursuit, Officer ABELLANIDA located KEAULII hiding in the yard area of 87-2004 Farrington Highway, Waianae, Hawaii 96792. Officer ABELLANIDA observed that KEAULII had taken off the camouflage jacket and was attempting to discard the shoulder holster he was wearing.

13. HPD D-8 CRU Officer Pio FAAMATAU responded to the scene and located the two male occupants of the Suspect Vehicle. The males were identified and released.

14. On May 21, 2020, at about 3:05 p.m., Officer LACSON placed KEAULII under arrest for Place to Keep Pistol or Revolver, two counts of Ownership Prohibited, Place to Keep Ammunition, Resisting Arrest and Criminal Contempt of Court.

15. During a search incident to a lawful arrest, Officer LACSON recovered a single 9mm cartridge from KEAULII's right cargo pants pocket, and it was submitted into HPD evidence by HPD D-8 CRU Officer Gregory R. ARRELL.

16. HPD D-8 CRU Officer Curtis M. MASANIAI responded to the scene, secured the Suspect Vehicle and observed what appeared to be a silver-colored pistol on the floorboard area of the Suspect Vehicle's front driver's side seat. Officer MASANIAI recovered the pistol, determined that it had one chambered cartridge and an empty magazine.

17. Officer ARRELL subsequently submitted a chrome colored semi-automatic Bruni Kal. 8mm pistol (item #1), two gold-colored 9mm cartridges (items #2 and #3) and one pistol magazine (item #4) into HPD evidence.

18. ATF Special Agent Joseph Villagomez, who has received specialized training from ATF regarding the Interstate Nexus element of select federal firearm crimes and has been deemed qualified by ATF to provide opinion testimony in this area, examined items #2 and #3, and determined that those items were manufactured outside of the State of Hawaii and meet the definition of "ammunition" under 18 U.S.C. § 921(a)(17). In light of that determination, the ammunition designated as items #2 and #3 must have traveled in interstate or foreign commerce prior to being possessed by KEAULII in Hawaii.

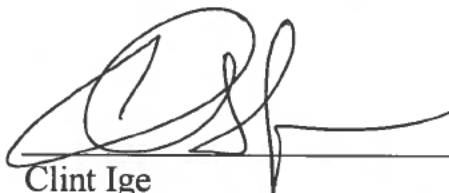
19. According to the Hawaii Criminal Justice Information System (CJIS), KEAULII has been convicted of two crimes punishable by imprisonment for a term exceeding one year:

- a. Robbery 2, in violation of H.R.S. § 708-0841, in 2006, for which he was re-sentenced to 10 years imprisonment.; and

- b. Unauthorized Control of Propelled Vehicle, in violation of H.R.S. § 708-0836, in 2018.

17. Based on the foregoing, I believe probable cause exists to charge the named defendant with the crime(s) delineated in the foregoing Criminal Complaint.

Respectfully submitted,



Clint Ige
Task Force Officer, HSI

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2), on this 22nd day of May 2020, at Honolulu, Hawaii.



Rom A. Trader
United States Magistrate Judge